

GREENPEACE

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Environmental Affairs Division

August 7, 1986

Lynn Davison
Director, Environmental Affairs
Seattle City Light
Department City Light Building
1015 Third Avenue
Seattle, WA. 98104

Dear Lynn Davison:

Following the reading of your letter and our meeting yesterday at the Mayor's Environmental Advisory Committee (EAC) we would like to express our disappointment by your sluggishness in moving ahead on developing environmentally sound policies at Seattle City Light regarding toxic substances and their fate. We are not convinced that there is a strong commitment within the agency to protect the environment or meet or exceed legislative mandates. Let me outline our concerns in the hope that you can address them and alleviate our growing fears.

1. Your comments regarding detoxification vs. incineration sounded as if you thought that detoxification was merely something "Greenpeace wants" The implication being that you would not burn or bury PCB's for Greenpeace's benefit, and not necessarily for the environment's benefit. In addition, your comments that landfilling was the worst alternative, make us realize that you view incineration as being relatively benign and perhaps something to which only Greenpeace objects. It is our concern that your department remains uneducated following the debate of last year on the production of dioxins and furans and their impact to human health and wildlife.

2. The fact that you were unwilling to state a preference for offsite decontamination over offsite incineration for the Lake Union Steam Plant (LUSP) oil indicates a step backwards for Seattle City Light. Following the public comment process and the decision on the disposal of the LUSP oil, SCL made a clear preference for decontamination. The fact that you are backsliding on that now is most disturbing.

3. We have heard for over a year now about a proposed citizens advisory committee to the Environmental Affairs Division of SCL and still it is not convened. Such a committee would help educate SCL staff as to the dangers of various disposal options.

4. You stated at the EAC meeting that SCL is stricter than state or federal law regarding PCB's. However everything mentioned in your letter seemed to fit the letter of TSCA and

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remain out of compliance with state hazardous waste laws which set a clear preference for decontamination over disposal. In addition state law now has an action level of 2ppm for PCB's which none of your action levels appear to reflect. In what respects has SCL surpassed state or federal law?

5. Also disturbing, was your lack of knowledge regarding the Westinghouse detoxification program which seems to indicate that this was not a program which SCL had much involvement in initiating and was perhaps a program which was already underway by Westinghouse, mentioned only to offer us token accomplishment.

6. You were unable to adequately explain why, if Westinghouse can economically decontaminate some of your transformer oils, why they cannot decontaminate all or most of your oils.

7. Finally the fact that you were not willing to take the simple step of committing to an in-house policy setting preference for treatment over disposal is still difficult to understand. Especially in light of the fact that it is state law.

We have had a good relationship with SCL in the past, but we well remember that of the three issues we have recently been involved in with SCL, only one was accomplished without Greenpeace having to threaten strong action or involve itself in active campaigning. We do not feel we are asking for a lot when we ask for a change in SCL's toxic substances policy.

In regards to the LUSP oil issue, we would like SCL to investigate the possibility of providing the capital, bearing the potential liability and enter into a joint agreement with Chem Decon themselves. In any event, you cannot expect us to stand by while a hard fought precedent favoring treatment over environmentally destructive incineration, one in which SCL had to be dragged kicking and screaming over the threshold of environmentally benign practices, gets bypassed by irrelevant deadlines and an unwillingness on SCL's part to accept potential liability. Greenpeace will have no choice but to actively defend the precedent setting decision and make every effort to prevent the oil from being landfilled or incinerated.

In closing, we would like to state that we are very pleased and see great potential by your stated intentions of working actively with other utilities in developing environmentally sound policies and decontamination markets. It is our hope that Seattle City Light will be the environmental leaders in the utility community. In addition we are pleased with your Westinghouse contract but need evidence to show that this is something more than a token program.

Please provide us with the results of your research on who is doing decontamination in this continent. We would like to receive the details of the Westinghouse agreement. In addition

we would like to see what R & D plans you have that you claim to be necessary. Perhaps we can help you find the wheels that need not be reinvented, though we'd prefer that those literature searches be done by your agency.

We await your response to these concerns and hope to continue to work together for the betterment of our shared environment. Please contact us at any time if you would like to meet regarding any of these issues.

Sincerely,


James Puckett


Shelley Stewart

cc: Hardy
Croil
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